

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**Minnesota Voters Alliance, Ronald Moey,
Marissa Skaja, Charles R. Halverson, and
Blair L. Johnson,**

Court File NO. 20-CV-02049

Plaintiffs,
vs.

**DECLARATION OF
ERICK G. KAARDAL**

City of Minneapolis,

Defendant.

I, Erick G. Kaardal, being duly sworn, declares as follows:

1. I have personal knowledge of the following.
2. I am an attorney for the Plaintiffs Minnesota Voters Alliance, Ronald Moey, Marissa Skaja, Charles R. Halverson, and Blair L. Johnson.
3. Attached as Exhibit A is a copy of the grants page from the website of the Center for Tech and Civic Life.
4. Attached as Exhibit B is a copy of the Center for Tech and Civic Life's website page identifying the \$250 million contribution it received from Dr. Priscilla Chan and Mark Zuckerberg;
5. Attached as Exhibit C is a copy of a Chicago NPR story "Not Plain A: Charities Are Stepping Up To Pay For 2020 Elections," dated September 18, 2020.
6. Attached as Exhibit D is a copy of a report generated by the Minneapolis City Clerk's Office to the City Council's Policy & Government Oversight Committee, dated June 5, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 24, 2020

/s/Erick G. Kaardal
Erick G. Kaardal

Hennepin County
State of Minnesota